

## **REMARKS**

Favorable reconsideration of this application is requested in view of the following remarks. Claims 14-20 are pending, with claim 14 being the sole independent claim.

### **Objections to the Drawings**

The proposed drawing correction has been objected to by the Examiner. Applicants respectfully request that the Examiner withdraw this objection.

Applicants believe that proposed Figure 4B is fully supported and described in the specification. However, without conceding that Figure 4B adds new matter, Applicants hereby withdraw that drawing. Accordingly, Applicants have re-labeled Figure 4A as Figure 4.

With respect to copies marked in red, because Figure 4 is new, there are no "corrections" to that figure. Nonetheless, a "red" version of Figure 4 is submitted herewith to remove this issue.

In addition, the previously unnumbered arrow shown in Figure 1A has been identified as element 93 in Figure 1A. A marked-up copy of Figure 1A is submitted showing the change to the drawing in red ink.

Applicants submit the specification and figures clearly describe a die shaped as shown in Figure 4. Applicants also submit that anyone having ordinary skill in the art would understand the die to be as it is shown in those figures. More specifically, elements 91 and 92 are supported, for example, at page 13, lines 3-13, which discuss a top and bottom part of the die. Figures 1A and 1B also clearly establish the shape of the die shown in Figure 4 through the depiction of the sealing resin 40 formed by the die. Also, the injection port 90 is described at page 8, line 35 through page 9, line 13 in the specification and depicted in Figures 1A and 1B. Accordingly, Applicants respectfully submit that Figure 4 is fully supported by the specification and drawings.

### **Objection to the Specification**

The abstract has been objected to by the Examiner. In particular, the Examiner has requested support for the previous amendment to the abstract. The previous amendment to the abstract is supported, for example, at page 3, lines 11-20 and at page 4, lines 15-20.

The specification has been objected to by the Examiner as introducing new matter. Applicants respectfully disagree. "Towards" is specifically described at page 4, lines 15-17. Also, as discussed above, Figure 4 is fully supported in the specification and, therefore, reference to that figure is appropriate.

Accordingly, Applicants respectfully request that these objections be withdrawn.

### **Claim rejections - 35 U.S.C. § 103(a)**

Claims 14-20 stand rejected as being unpatentable over U.S. Patent No. 5,349,238 ("*Ohsawa*") in view of U.S. Patent No. 4,857,483 ("*Steffen*"), and further in view of U.S. Patent No. 6,277,225 ("*Kinsman*"). Applicants respectfully traverse this rejection.

Initially, Applicants note that in the "Response to Arguments" section the Examiner has stated that Applicants have relied on features which are not recited in the rejected claims. Applicants respectfully submit that this assertion is in error. The features identified in the "Response to Arguments" section as not being in the claims are recited in claim 14. Accordingly, Applicants respectfully request that the Examiner reconsider his rejections in view of this misunderstanding.

Moreover, the Examiner does not appear to have fully considered Applicants previous remarks in view of the Examiner's objections to the drawings and specification. Applicants have fully addressed these objections above and requested that those objections be withdrawn. Accordingly, Applicants also respectfully request that the Examiner reconsider the arguments

presented in the last response. For the Examiner's convenience, these arguments are presented below.

Independent claim 14 recites a method for manufacturing an electronic device. A first lead with an element placement pad, a second lead that is disposed at a distance from the element placement pad, and an electronic element placed on the element placement pad are placed within a die. A sealing resin is injected in a die, in a direction substantially parallel to a surface of the element placement pad, to seal the electronic element, the element placement pad, a part of the first lead, and a part of the second lead in a package.

*Ohsawa* discloses a semiconductor device including a lead frame. In particular, at Figure 1A, *Ohsawa* discloses a connection between an electrode pad 2, on a surface of a semiconductor element 1, and a lead frame 3. *Ohsawa*, however, does not disclose or suggest that an electronic element is placed on an element placement pad of a first lead as recited in claim 14 of the present application. For example, the semiconductor element 1 of *Ohsawa* is not placed on an element placement pad of a first lead, instead it is placed beneath electrode pad 2.

*Steffen* does not remedy the deficiencies of *Ohsawa*. *Steffen* discloses a method for encapsulating integrated circuits. *Steffen*, however, does not disclose or suggest that a sealing resin is injected in a die in a direction substantially parallel to a surface of the element placement pad, as recited in claim 14.

For the foregoing reasons, Applicants submit that independent claim 14 is allowable over the cited art.

Claims 15-19 depend from claim 14 and are believed allowable for the same reasons. Moreover, each of these dependent claims recites additional features in combination with the

features of claim 14, and is believed allowable in its own right. Individual consideration of these dependent claims is respectfully requested.

Claim 20 is also believed allowable over the cited art for the same reasons discussed above with respect to claim 14. *Kinsman* does not remedy the deficiencies of *Ohsawa* and *Steffen*. *Kinsman* discloses a "lead over chip" semiconductor die assembly. In particular, at Figures 5A and 5B, *Kinsman* discloses that a filler particle 130 is lodged in a space formed by dielectric adhesive 114 between a die 102 and a lead 112. *Kinsman*, however, does not disclose or suggest the relationship between a particle diameter of a filler and the bending depth of a first lead, as recited in claim 20.

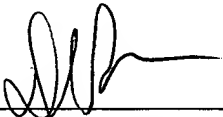
Therefore, Applicants submit that claim 20 is also allowable over the cited art.

In view of the above, favorable reconsideration in the form of a notice of allowance is requested.

Respectfully submitted,

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